

# Exhibit A



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

June 26, 2019

*Via Electronic Mail*

Daniel Toal  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
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New York, New York 10019-6064  
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Re: *People of the State of New York v. Exxon Mobil Corporation*, Index No.  
452044/2018 (Sup. Ct. N.Y. Cnty.)

Dear Dan:

On behalf of the Office of the Attorney General (“OAG”), I am writing to provide Exxon Mobil Corporation (“ExxonMobil”) with an updated preliminary list of witnesses (the “List”) that the OAG may call at trial in the above-referenced matter. The List represents a good faith effort, based on information currently available to the OAG, to identify those witnesses the OAG is most likely to call at trial. The OAG explicitly reserves the right to modify, amend, or supplement the List for any reason prior to service of the final pre-trial witness list.

In addition, the OAG explicitly reserves the right to call (i) any witness identified by ExxonMobil, (ii) a substitute for any witness who is unavailable, (iii) custodians of records or any other witness for purposes of authenticating an exhibit, and (iv) additional witnesses for purposes of impeachment or rebuttal. The OAG also reserves the right to decide not to call the witnesses on the List. Please note that the List does not include expert witnesses, whom the OAG identified on May 1, 2019.

The provision of the List does not alter the OAG's rights under the CPLR, the Rules of the Commercial Division, or the Practice Rules of Part 61. The OAG reserves the right to object to any discovery request, the admissibility or use of any evidence, or the calling of any witness by ExxonMobil (including those on the List) on any available ground, in whole or in part, in any proceeding in this action or in any other action.

Sincerely,

/s Kevin Wallace

Kevin Wallace

Enclosure: Preliminary Witness List

**Preliminary Witness List**

**Witnesses Controlled by ExxonMobil and Former Employees**

1. Robert Bailes
2. Kirsten Bannister
3. William Colton
4. Brant Edwards
5. Norma Fisk
6. Dominic Genetti
7. Daniel Hoy
8. Jason Iwanika
9. Stephen Littleton
10. Robert Luetngen
11. Todd Onderdonk
12. Guy Powell
13. David Rosenthal
14. Mark Shores
15. Christina Stobart
16. Rex Tillerson
17. Peter Trelenberg

**Third Party Witnesses**

1. Sister Patricia Daly, Sisters of St. Dominic
2. Robert Fohr, Presbyterian Church, Presbyterian Mission
3. Danielle Fugere, As You Sow
4. Michael Garland, New York City Office of the Comptroller
5. Stephanie Hansen, The Vanguard Group, Inc.
6. Rakhi Kumar, State Street Global Advisors
7. Natasha Lamb, Arjuna Capital LLC
8. Edward Mason, Church Commissioners of England
9. Roger Read, Wells Fargo Securities, LLC
10. John Reilly, Massachusetts Institute of Technology
11. J.R. Rickertsen, Bank of America
12. Timothy Smith / Aaron Ziulkowski, Walden Asset Management